

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

FIRST-CLASS MAIL AND PERIODICALS
SERVICE STANDARD CHANGES, 2021

Docket No. N2021-1

**NOTICE OF WITHDRAWAL OF RESPONSE OF THE UNITED STATES POSTAL
SERVICE WITNESS ROBERT CINTRON TO QUESTION 3(b) OF THE PUBLIC
REPRESENTATIVE'S FIRST INTERROGATORIES
(PR/USPS-T1-3(b))
(May 27, 2021)**

The United States Postal Service hereby gives notice of the withdrawal of the response of Witness Cintron to the Public Representative's Interrogatory PR/USPS-T1-3 subpart (b) only, which Postal Service Institutional Witness Owens has separately answered. Witness Cintron's revised response to the Public Representative's Interrogatory PR/USPS-T1-3 reflecting the withdrawal of subsection (b) is submitted herewith.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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**MAY 27, 2021 REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS CINTRON TO PUBLIC REPRESENTATIVE'S INTERROGATORY
PR/USPS-T1-3**

PR/USPS-T1-3: Please refer to page 30, lines 18-20, of witness Cintron's testimony. Witness Cintron's testimony states that the Postal Service "has carefully considered impacts of the proposed changes to relevant stakeholders and measures to mitigate those impacts."

- a. Please explain how the Postal Service has evaluated the impact of presort mailers who may opt to dropship their mailpieces further downstream to avoid service disruption so that their customers can get their mail in time.
- b. Please confirm whether the Postal Service has considered a dropship discount. If confirmed, please provide:
 - i. An estimated discount;
 - ii. An explanation of how it was derived;
 - iii. And any potential cost/revenue impacts.
- c. Please refer to question 1, above. Please confirm that the Postal Service has considered that dropship mailers may change their mailing patterns in response to the proposed change and how that might result in surface transportation continuing to be underutilized.
 - i. If confirmed, please explain any additional measures in consideration to ameliorate underutilization.
 - ii. If not confirmed, please explain why the Postal Service does not believe these behaviors are likely to change, or why these behaviors are unlikely to affect utilization of the surface transportation network.

RESPONSE:

- a. The Postal Service considered the impact to customers as outlined in Cintron's testimony (USPS-T-1) at 30 and 31.
- b. [WITHDRAWN]
- c. The service standard proposal does not impact dropship service standards. It is understood that mailers may change mailing patterns in response to the proposal.
 - i. Monitoring lane utilization will continue, and under-utilized transportation will be adjusted and eliminated where possible to improve efficiencies.